

Publication No. 2003/0168966 hereinafter, “Kobayahsi”). Claim 10 was rejected under 35 U.S.C. § 103(a) as being unpatentable over “Yamazaki” in view of “Tabuchi”, in further view of Suh (U.S. Patent Publication No. 2005/0088106 hereinafter, “Suh”). Claims 12-17, 43 and 47 were rejected under 35 U.S.C. § 103(a) as being unpatentable over “Yamazaki” in view of “Tabuchi”, in further view of Nakamura (U.S. Patent Publication No. 2004/0216324 hereinafter, “Nakamura”) Claims 1, 5-7, 9 and 11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over “Yamazaki” in view of “Tabuchi”, “Nakamura” and Kiguchi (U.S. Patent Publication No. 2003/0210361 hereinafter, “Kiguchi”). Claim 23 was rejected under 35 U.S.C. § 103(a) as being unpatentable over “Yamazaki” in view of “Tabuchi”, “Nakamura” and “Kiguchi”, in further view of Natsuo (Japanese Patent Publication No. 2001-281438 hereinafter, “Natsuo”). Claim 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over “Yamazaki in view of “Tabuchi”, “Nakamura” and “Kiguchi”, in further view of Lee (U.S. Patent Publication No. 2003/0165714 hereinafter; “Lee”). Claim 42 was rejected under 35 U.S.C. § 103(a) as being unpatentable over “Yamazaki” in view of “Tabuchi” and “Nakamura”, in further view of Akedo (U.S. Patent Publication No. 2001/0044259 hereinafter, “Akedo”) Claims 44-46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over “Yamazaki” in view of “Tabuchi” and “Nakamura”, in further view of “Akedo” however, fail to render the claimed invention unpatentable. Each of the claims recite a specific combination of features that distinguishes the invention from the prior art in different ways. These rejections are traversed for the reasons set forth below.

The Examiner maintains his rejection of the claims based on a combination of Yamazaki (US 2002/0104995) and Tabuchi (US 2003/0059717). Applicants contend that there is no teaching or suggestion to proceed to this combination. Moreover, Applicants believe the overall disclosure of Tabuchi teaches away from the teachings of Yamazaki.

Specifically, Tabuchi teaches forming the photosensitive plate agent 2 by coating the surface of the coating layer 1-3 with a liquid, as recited in paragraphs [0140] or [0127] of Tabuchi. In the teachings of Tabuchi, hydrophobicity and hydrophilicity of surfaces play a key role to prevent and foster adhesion of **liquids** (dampening water, ink or photosensitive agent solution). Considering its purpose, it is favorable for the coating layer 1-3 to be hydrophilic to enhance adhesion of dampening water and photosensitive agent solution.

On the other hand, Yamazaki teaches formation of a display device using a technology where layers of thin film transistor are formed using **vacuum-related techniques**, such as sputtering or CVD, as recited in [0083] of the specification of the instant application. Yamazaki does not teach the use of liquids to form patterns, such as gate, drain or source electrode. Further, the semiconductor industry has ample experience of dealing with formation of thin-film layers on appropriate substrates, or on sub-layers, that may be necessary for dealing with adhesion issues. A photocatalyst layer is NOT necessary to the invention of Yamazaki, and there is no evidence that it would lead to any enhancement. To proceed to combination provided by the Examiner, one would need a clear incitation that is not found in cited prior art. Thus, applicants assert that **there is no reason to apply the coating layer 1-3 of Tabuchi to the invention of Yamazaki.**

In addition, Applicants note that photosensitive plate agent 2 formed on the photocatalyst layer 1-3 is bound to be **removed frequently** (at least each time a new image has to be printed), as recited in [0110] of Tabuchi. Thus, the meaning of the term “adhesion” does not seem to be construed in the same way as in the claimed invention or that of Yamazaki, where a layer has to adhere **permanently** to its substrate. For these reasons, Tabuchi should be not be used as a basis to remedy the deficiencies of Yamazaki.

In view of the foregoing remarks, this claimed invention is not rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this response, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

**Except** for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. §§ 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account No. 19-2380. This paragraph is intended to be a **CONSTRUCTIVE PETITION FOR EXTENSION OF TIME** in accordance with 37 C.F.R. § 1.136(a)(3).

Should the Examiner believe that a telephone conference would expedite issuance of the application, the Examiner is respectfully invited to telephone the undersigned at (202) 585-8207.

Respectfully submitted,

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